

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA, :
 :
 Plaintiff, :
 :
 vs. :
 :
 QUANTAVIUS FOSTER, :
 :
 Defendant. :

CASE NO. 1:19-CR-00308-AT-RGV-3

MOTION FOR DISCLOSURE OF IMPEACHING INFORMATION

COMES NOW, the Defendant, and respectfully moves this Court for entry of an order directing the United States to investigate and disclose all of the following within the possession, custody, control, or the existence of which is known or by the exercises of due diligence could become known to the United States:

1.

Any and all consideration or promises of consideration given to or made on behalf of government witnesses. By "consideration", the Defendant refers to absolutely anything of value or use, including but not limited to immunity grants, witness fees, special witness fees, transportation assistance, assistance to members of witness' family or associates or witness, assistance or favorable treatment with respect to any criminal, civil, or administrative dispute with the State or the United States, and anything else which could arguably create an interest or bias in the witness in favor of the State or against the Defendant or acts as an inducement to testify or to color testimony.

2.

Any and all prosecutions, investigations or possible prosecutions pending or which could be brought against the witness and any probationary, parole, or deferred prosecution status of the witness.

3.

Any and all records and information revealing felony convictions attributed to this witness.

4.

Any and all records and information showing prior misconduct or bad acts committed by the witness.

5.

Any and all personnel files for the witness.

This 29TH day of October, 2021.

/s/ Alexander Repasky
Alexander J. Repasky
Attorney for Defendant
Georgia Bar No. 601050

4880 Lower Roswell Road, Suite 165
Marietta, Georgia 30068
(770) 912-4016
alexrepasky@aol.com

CERTIFICATE OF GOOD FAITH CONFERENCE

I hereby certify that counsel for the movant has made reasonable efforts to confer with all parties and non-parties who may be affected by the relief sought in the motion but has been unable to do so. The reasonable efforts made were specifically as follows: Discussions with the Assistant United States District Attorney.

/s/ Alexander Repasky
Alexander J. Repasky
Attorney for Defendant